

Message

From: Lara Floyd [lara@whitebluffsconsulting.com]
Sent: 11/3/2020 12:18:41 AM
To: Rains, Karl (ECY) [KRAI461@ECY.WA.GOV]; Edmondson, Lucy [Edmondson.Lucy@epa.gov]; Nickel, Brian [Nickel.Brian@epa.gov]
CC: Benjamin Floyd [ben@whitebluffsconsulting.com]
Subject: FW: NPDES history PCBs Kaiser stormwater
Attachments: KAIC Ponds Action Memo_FINAL.pdf

Hi,

Please see the email below from Kris Holm. We aren't quite sure how to respond to it so thought we would pass it along for your input.

Thanks,
Lara

From: Krisholm <krisholm@comcast.net>
Sent: Monday, November 2, 2020 3:30 PM
To: Lara Floyd <lara@whitebluffsconsulting.com>; Benjamin Floyd <ben@whitebluffsconsulting.com>
Subject: NPDES history PCBs Kaiser stormwater

https://response.epa.gov/sites/14546/files/KAIC%20Ponds%20Action%20Memo_FINAL.pdf

See pages 3 and 4 in particular. Summarizes significant levels of PCBs in stormwater pond and discharge and pond sediments from NPDES permit submissions 2018 2019. NPDES permit was Ecology issued. This PCB data is relevant to the SRRTTF source study as well as the separate Little Spokane PCB TMDL which also failed to identify this verified upstream source. Please take a look.

I suggest that both EPA and Ecology at least be prepared to address these specific Clean Water Act issues at the December SRRTTF meeting. MTCA and CERCLA are relevant as well but the 2018/19 data was part of the NPDES coverage for the site.

In my opinion there has been a fairly long term communication problem on this source despite the participation of both EPA and Ecology water quality/NPDES staff in the SRRTTF since before its formal creation.

Please feel free to call me if appropriate.

Kris Holm

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